

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 WESLEY FLETCHER,

Defendant.

Case: 2:22-cr-20485

Assigned To : Murphy, Stephen J., III

Referral Judge: Patti, Anthony P.

Assign. Date : 9/16/2022

Description: INFO USA V. FLETCHER (NA)

18 U.S.C. § 1343 – Wire Fraud

INFORMATION

The United States Attorney charges:

GENERAL ALLEGATIONS

At all times relevant to this Information:

1. Wesley Fletcher (Fletcher) (D-1) was a resident of Roseville, and was the owner of The Transportation Network, LLC, The Transportation Networks, LLC, and TTN Technologies, Inc.
2. Fletcher's company The Transportation Network, LLC provided business development and transportation services in the Eastern District of Michigan and elsewhere.

3. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act was a federal law enacted in March 2020 and designed to provide emergency financial assistance to individuals and businesses suffering the economic effects caused by the COVID-19 pandemic. One source of relief provided by the CARES Act was in forgivable loans to small businesses for job retention and certain other expenses, through a program referred to as the Paycheck Protection Program (“PPP”).

4. To obtain a PPP loan, a qualifying business had to submit a PPP loan application signed by an authorized representative of the business. The application required the business, through its authorized representative, to acknowledge the program rules and make certain affirmative certifications to be eligible for the loan. The business, through its authorized representative, had to accurately report its average monthly payroll expenses and number of employees. These figures were used to calculate the amount of money the business was eligible to receive.

5. Economic Injury Disaster Loans (EIDL), were federal loans disbursed through the Small Business Administration (SBA) which were intended to help businesses meet financial obligations and to provided operating expenses during the COVID pandemic.

6. To obtain an EIDL loan a qualifying business had to provide accurate information about its operations, including number of employees, gross revenue, and cost of goods sold.

7. Fletcher maintained a business checking account at Chase Bank in the Eastern District of Michigan.

8. EIDL funds fraudulently obtained by Fletcher were sent to his Chase Bank account in the Eastern District of Michigan from the Small Business Administration (SBA) though its servers in Sterling, Virginia.

COUNT ONE

(18 U.S.C. § 1343 - Wire Fraud)

D-1 WESLEY FLETCHER

The general allegations are included in this count.

9. From in or about May 2020, through in or about February 2021, in the Eastern District of Michigan, Southern Division, Fletcher, having devised a scheme and artifice to defraud and for obtaining money by means of false and fraudulent material pretenses, representations and promises, did the following.

The Scheme

10. In May 2020, Fletcher began applying for PPP and EIDL loans using his his companies.

11. Using all three of his companies, Fletcher applied for and received four PPP loans. In all four applications Fletcher, with intent to defraud, falsely claimed that each of his companies had 6 employees and an average monthly payroll of \$37,360.

12. Using all three of his companies, Fletcher applied for and received three EIDL loans. In all three applications Fletcher, with intent to defraud, fraudulently inflated the companies' gross income and cost of goods sold.

13. And for the purpose of executing the scheme, on June 19, 2020, Fletcher transmitted and caused the transmission by means of wire communication in interstate or foreign commerce, writings, signs, signals, pictures or sounds, in the form of a wire transfer of funds in the amount of \$126,400 from Sterling, Virginia to J.P. Morgan Chase Bank in the Eastern District of Michigan.

All in violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATION

(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – *Criminal Forfeiture*)

14. The general allegations and Count One of this Information are incorporated herein by this reference for the purpose of alleging forfeiture under Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

15. Upon being convicted of violating Title 18, United States Code, Section 1343, defendant Fletcher shall forfeit to the United States of America, under Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is

derived from proceeds traceable to the offense. The forfeiture in this case may include entry of a forfeiture money judgment against defendant Fletcher in an amount up to the value of the property subject to forfeiture for the violations of conviction.

16. If, by any act or omission of the defendant, the proceeds of the offense cannot be located upon the exercise of due diligence, have been transferred, sold to, or deposited with a third party, have been placed beyond the jurisdiction of the court, have been substantially diminished in value, or have been commingled with other property which cannot be divided without difficulty, the United States of America shall seek to forfeit substitute property under Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), up to the value of the forfeitable property described above.

Respectfully submitted,

DAWN N. ISON
United States Attorney

JOHN K. NEAL
Assistant U.S. Attorney
Chief, White Collar Crimes Unit

s/ Karen L. Reynolds

Karen L. Reynolds

Assistant United States Attorney

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Dated: September 16, 2022

United States District Court
Eastern District of Michigan

Criminal Case Cover Sheet

Case Number
2:22-cr-20485

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: K.L.R

Case Title: USA v. WESLEY FLETCHER

County where offense occurred : Macomb

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☒ Information --- no prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

9/16/2022

Date

s/ Karen L. Reynolds

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 Attorney Bar #:

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.